

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**IN RE: JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES
PRACTICES, AND PRODUCTS
LIABILITY LITIGATION**

MDL NO. 16-2738 (FLW) (LHG)

***THIS DOCUMENT
RELATES TO ALL CASES***

CERTIFICATION OF P. LEIGH O'DELL, ESQ.

P. Leigh O'Dell, Esq., hereby certifies as follows:

1. I am an attorney at law and member of the law firm of Beasley, Allen, Crow, Methvin, Portis & Miles, P.C. I was appointed as Plaintiffs' Co-Lead Counsel to represent all Plaintiffs in the above-captioned matter.

2. I submit this Certification based on personal knowledge in support of the Plaintiffs' Steering Committee's Reply to Johnson & Johnson and Johnson Consumer Inc.'s Memorandum of Law in Opposition to Plaintiffs' Steering Committee's Motion to Exclude the Geological Testing Opinions of Drs. Ann G. Wylie and Melinda Darby Dyar.

3. Attached hereto as Exhibit 1 is a true and correct copy of the Deposition Errata Sheet of Ann G. Wylie, Ph.D.

4. Attached hereto as Exhibit 2 is a true and correct copy of Bates Number JNJTALC000880470.

5. Attached hereto as Exhibit 3 is a true and correct copy of the transcript of the JIFSAN Symposium Abestos in Talc Main Session (Nov. 28, 2018).

6. Attached hereto as Exhibit 4 is a true and correct copy of Yamate et al., *Methodology for the Measurement of Airborne Asbestos by Electron Microscopy* 46 (1984).

7. Attached hereto as Exhibit 5 is a true and correct copy of EPA Regulations (AHERA), 40 C.F.R. Pt. 763, Subpt. E, App. A, at 871, 891, 893.

8. Attached hereto as Exhibit 6 is a true and correct copy of ISO 22262-2, “Air Quality – Bulk materials – Part 2: Quantitative determination of asbestos by gravimetric and microscopical methods” (2014).

9. Attached hereto as Exhibit 7 is a true and correct copy of ISO 13794, “Ambient Air – Determination of asbestos fibres – Indirect-transmission electron microscopy method,” at 45 (1999).

10. Attached hereto as Exhibit 8 is a true and correct copy of “*Rondorfite_Mineral information, data and localities*,” www.Mindat.org (last accessed June 15, 2019).

11. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I may be subject to punishment.

Dated: June 17, 2019

/s/ P. Leigh O'Dell
P. Leigh O'Dell